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**Counsel for Membership
Marketing Partners, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
(DALLAS DIVISION)**

| | | |
|--|----------|---------------------------------|
| IN RE: | § | |
| | § | CHAPTER 11 |
| NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC, | § | CASE NO. 21-30085-hdh-11 |
| DEBTORS.¹ | § | JOINTLY ADMINISTERED |
| | § | |

**MMP'S WITNESS & EXHIBIT LIST FOR
HEARING SCHEDULED FOR FEBRUARY 24, 2021 AT 2:00 P.M.**

Membership Marketing Partners, LLC (“MMP”), hereby files this *Witness and Exhibit List* for the hearing scheduled for **Wednesday, February 24, 2021 at 2:00 P.M.** prevailing central time on the following matter:

- a. *MMP's Motion for an Order Requiring the United States Trustee to Reconstitute the Official Committee of Unsecured Creditors* [Dkt. 164].

MMP'S WITNESS LIST

1. Sonya Rowling;
2. Anyone designated by any other party;
3. Any witness necessary to authenticate a document; and

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

4. Rebuttal and impeachment witnesses, as necessary.

MMP reserves the right to supplement this Witness List, as necessary.

MMP'S EXHIBIT LIST

| EXHIBIT | DESCRIPTION OF EXHIBIT | OFFERED | OBJECTION | ADMITTED |
|----------------|--|----------------|------------------|-----------------|
| A | Email exchange dated February 9-11 between Judith Ross and Lisa Lambert | | | |
| B | Email exchange dated February 11, 2021 from Steve Morris of Valtim, Inc. to Judith Ross | | | |
| C | Email exchange dated February 11, 2021 from Juan R. Mostek of Quad/Graphics to Judith Ross | | | |
| D | Voluntary Petition and Top 20 Unsecured Creditors List, dated January 15, 2021 | | | |
| E | Court Docket dated February 19, 2021 | | | |
| | Any exhibits designated by any other party | | | |
| | Any exhibits necessary and appropriate as rebuttal evidence | | | |

MMP requests that the Court take judicial notice of pleadings and other documents filed with the Court. MMP reserves the right to supplement this Exhibit List, as necessary.

Dated: February 19, 2021

Respectfully submitted,

By: /s/ Judith W. Ross

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**COUNSEL TO MEMBERSHIP
MARKETING PARTNERS, LLC**